

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: RAYMOND L BAKER

) Case No. 04 B 02152
)
) Chapter 13
Debtor)
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

RAYMOND L BAKER

1706 N LOCKWOOD
CHICAGO IL

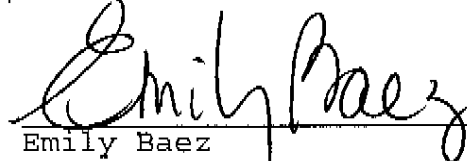
THOMAS HOLSTEIN
109 W ELM ST
CHICAGO IL

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Please take notice that on the 21st day of July 2004 at 11:45 AM I or my designee will appear before the Honorable Judge JACK B SCHMETTERER in COURTROOM 682, 219 S DEARBORN ST, CHICAGO ILLINOIS, and present the motion set forth below.

I certify that this office caused a copy of this notice to be delivered to the above listed parties by depositing it in the U.S. Mail at 200 S. Michigan Ave., Chicago, IL. on June 8, 2004.


Emily Baez
For: Tom Vaughn, Trustee

MOTION TO DISMISS

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On January 20, 2004 the debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on March 10, 2004 , for a period of 59 months.
3. The plan will complete in 75 months, from the date of confirmation.

Wherefore, the Trustee prays that this case be dismissed for material default by the debtor with respect to a term of a confirmed plan, pursuant to Section 1322 (d) and Section 1307 (c) (6).

Respectfully submitted,


For Tom Vaughn, Trustee

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

JUN 09 2004

KENNETH S. GARDNER, CLERK
PS REP. - KG